



DEPARTMENT OF CITY PLANNING

100 LARKIN STREET SAN FRANCISCO, CALIFORNIA 94102

San Francisco City Planning Commission And San Francisco Redevelopment Agency

Draft Environmental Impact Report

YERBA BUENA CENTER SUPPLEMENT

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Summary of Comments, and Responses

EE 81.27

Publication Date: 24 April 1981

Public Comment Period: 24 April 1981 through
11 June 1981

Public Hearing Date: 11 June 1981

Certification Hearing Date : 21 July 1981

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SAN FRANCISCO CITY PLANNING COMMISSION
AND SAN FRANCISCO REDEVELOPMENT AGENCY

DRAFT ENVIRONMENTAL IMPACT REPORT

YERBA BUENA CENTER
SUPPLEMENT

EE 81.27

SUMMARY OF COMMENTS, AND RESPONSES

14 JULY 1981

Public Comment Period: 24 April 1981 through 11 June 1981

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A. INTRODUCTION

This document contains the public comments received on the Draft Supplement to the Yerba Buena Center Environmental Impact Report and responses to those comments.

All substantive spoken comments received at a joint public hearing before the San Francisco Redevelopment Agency Commission and the City Planning Commission on June 11, 1981, and all substantive written comments received during the public review period from April 24, 1981 through June 11, 1981 were reviewed and summarized in the form of edited quotations.

The summarized comments and responses are grouped by subject matter, and each group of comments is followed by a corresponding group of responses. The order of topics generally follows the order in which these topics are treated in the Draft Supplement Environmental Impact Report. As the subject matter of a topic may overlap that of other topics, the reader may occasionally be referred to more than one group of Comments and Responses to review all information on a given topic. Where this occurs, cross-references are provided (e.g. "See also the Responses to Comments Nos. 10 and 18").

Several abbreviations are used throughout this report. "Draft Supplement" refers to the Draft Supplement to the Yerba Buena Center Environmental Impact Report. "YBC FEIR" refers to the Yerba Buena Center Final Environmental Impact Report (EE77.220), certified by the San Francisco Redevelopment Agency Commission and City Planning Commission in April 1978. "CB-1" and "SB-4" are the Yerba Buena Center blocks, Central Block One and Southern Block Four, respectively (see pages 9 - 15 and Figure 6 on page 21 of the Draft Supplement).

B. LIST OF PERSONS COMMENTING

Ms. Susan Bierman, Member
City Planning Commission

Ms. Dian Blomquist, Member
Redevelopment Agency Commission

Mr. Gary Agid
Chief, Local Support Branch
California Air Resources Board

Mr. Richard Gryziec

Ms. Sue Hestor

Mr. R. W. Sieker
District CEQA Coordinator
CalTrans

Mr. Michael A. Visconti
Manager, Plan and Project Review
Association of Bay Area Governments

SUMMARY OF COMMENTS, AND RESPONSES

1. HISTORY OF YERBA BUENA CENTER REDEVELOPMENT

COMMENT

Commissioner Susan Bierman: "Page 3, under B, the History of Redevelopment. Even though this is a Supplement, it does seem to me that the controversy is treated a little too lightly ...The only reference to controversy is 'interim plans for redevelopment of the area, and litigation involving redevelopment activity in the South of Market area are discussed in detail in the previous YBC FEIR'..."

RESPONSE

The detailed discussion of community-initiated law suits is contained in the YBC FEIR on pages 7 to 9, and is incorporated by reference into the discussion on page 3 of the Draft Supplement. According to the Guidelines for the Implementation of the California Environmental Quality Act (CEQA) (California Administrative Code, Title 14, Division 6, Chapter 3), a Supplement to an EIR need contain only the information necessary to make the previous EIR adequate for the project as revised (Section 15067.5(b)). Supplements to an EIR may incorporate by reference relevant unchanged information from the previous EIR, and where this is done, "the incorporated language shall be considered to be set forth in full as part of the text of the EIR" (Section 15148.(a)).

For clarity, the following has been added to the section, History of Redevelopment in the South of Market Area, on page 3, immediately before the last sentence:

When planning and implementation of the plans for YBC reached the point of property acquisition and relocation of businesses and residents, several suits were filed in local and federal courts. Some involved prolonged litigation and resulted in substantial delays to the project. They resulted also in project changes that accommodated expressed community interests; these included subsidized housing for the elderly, a portion of which has been completed.

2. DECISION PROCESS AND TIMING

COMMENT

Richard Gryziec: "The EIR is unique -- this one right here, the Supplement -- because it deals with items that have already been decided upon and acted upon by the Redevelopment Agency. In other words, it's coming after the fact rather than before the decision..."

"Let me expand a little bit about the notion that this EIR is illegal. This EIR was drafted long after the Agency in February of 1980 -- by vote of the Agency Commission approved -- a 32-page project offer including the very items, the 1500-room hotel, the 500 condos, the specific office and retail amounts of uses, only now coming under EIR review..."

"This EIR was drafted long after the Agency, with the Mayor's approval, sent out that project RFQ to the development community throughout the United States and Canada, and the EIR was drafted long after the Agency in November of 1980 selected a developer for exclusive negotiations based on the project as specified in the project RFQ."

RESPONSE

The Request for Qualifications (RFQ), sent by the Redevelopment Agency to developers in April 1980, included a possible program outline for development

on the three Central Blocks. It was not a commitment by the Redevelopment Agency to approve a land disposition agreement. The Land Disposition Agreement will be acted upon by the Redevelopment Agency Commission only after the appropriate environmental review process for the three Central Blocks is complete (see also the Response to Comment No. 4).

3. REDEVELOPMENT AGENCY JURISDICTION

COMMENT

Commissioner Susan Bierman: "Page 20. It seems to me there maybe should be some little discussion that the Redevelopment Agency doesn't have to abide by City Planning rules..."

RESPONSE

As discussed in the YBC FEIR, pages 3-4, and the Draft Supplement, page 3, the San Francisco Redevelopment Agency was established in 1948 by the Board of Supervisors under the enabling legislation of the California Community Redevelopment Law of 1945.

The Redevelopment Agency is a separate entity of the City and County of San Francisco; the members of its Commission are appointed by the Mayor. It has its own development standards, apart from the City Planning Code, which are approved by the Board of Supervisors as part of a redevelopment plan. The Yerba Buena Center Redevelopment Plan, most recently amended in September 1979, incorporated all applicable sections of the City Planning Code in effect at that time. The Interim Downtown Controls, approved by the Board of Supervisors in Ordinance No. 240-80 on June 1, 1981, which prohibit the granting of bonus floor area for any use other than residential, were not yet in effect. The Interim Controls, therefore, have not been incorporated into the Redevelopment Plan (see page 22 of the Draft Supplement). Approval of proposals for the Yerba Buena Center Redevelopment Area rests solely with the

Redevelopment Agency Commission. Site permits and related building permits for activity in the redevelopment area are obtained through the normal Bureau of Building Inspection process.

4. PROJECT APPROVAL PROCESS

COMMENT

Richard Gryziec: "... this EIR is part of a piecemeal project approval process that by going piecemeal serves to conceal rather than reveal the Redevelopment Agency's intentions, conceals those intentions from the public..."

"... one of the primary purposes of EIR's under CEQA is to make information about major projects, especially public projects, available to the public before major decisions are made. The chosen developer for this project has already submitted material that indicates that they are proposing to build at least 750,000 -- 750,000 -- square feet of high-cost condos on Central Block 2 and an unspecified amount of similarly priced condos on Central Block 3. This many condos, which are equal in amount to the whole of the Golden Gateway Project, the housing portion of it, would wholly change the nature of this project. Such housing could well be seriously incompatible with those uses designed to generate 18-hour-per-day activity. The parking requirement would be greatly increased. Other major impacts and changes in impacts would occur.

"No such housing was considered for blocks CB 2 and CB 3 in any of the plans covered by the April, 1978 EIR or this EIR Supplement..."

RESPONSE

For the purposes of the California Environmental Quality Act (CEQA), "all public or private activities or undertakings pursuant to or in furtherance of a redevelopment plan" are deemed to be a single project (Division 13, PRC, Chapter 2.6, Section 21090). In accordance with this, the YBC FEIR, certified

in 1978, was intended to analyze the environmental impacts of all of the alternative uses contemplated at that time for the entire YBC Redevelopment Area. As provided in Sections 15067 and 15067.5 of the CEQA Guidelines, therefore, when it was determined that subsequent changes in the uses proposed in the project for CB-1 and SB-4 might result in new significant environmental effects not covered in the YBC FEIR, this Supplement was prepared to contain the information necessary to make the previous EIR adequate for the revised project.

Olympia and York California Equities Corporation (O & Y) is under Exclusive Negotiating Rights for development on Central Blocks -1, -2, and -3. On April 28, 1981, Wilbur Hamilton, Executive Director of the Redevelopment Agency, announced that the Phase I report would be available from O & Y in the coming week. A public meeting was held before the Redevelopment Agency Commission on May 12th to hear public comment on the Phase I report.

The purpose of Phase I has been to evaluate and refine certain aspects of the development program set out in the RFQ and to establish directions respecting aspects of the development program other than the physical form of the project. The purpose of the Phase I report is to inform the Commission and the public. The Phase I report, which appears to be the source of the information cited in the comment, does consider the issue outlined in the RFQ of the compatibility of the development of market-rate housing on Central Blocks -2 and -3. Exact square footages, however, are not mentioned. The parameters discussed are that housing would not cover more than 25 percent of the area of CB-2 or CB-3, and no more than an average of 15 percent of both blocks. According to Thomas G. Conrad, Chief of Planning, Housing and Programming for the Redevelopment Agency (letter communication to the Department of City Planning, Office of Environmental Review, June 24, 1981), O & Y is currently developing a number of alternative development concepts for CB-2 and CB-3. These concepts include a no-housing alternative for CB-2 and CB-3. While some of the features of these alternative development concepts are advanced sufficiently to undergo environmental review, if required, other features of these concepts are not. Because all of the features on each block are intimately related with other features on each block, reviewing a few features in absence of information about the others would be infeasible. It should be noted that the RFQ to which O & Y responded allowed for housing development on CB-2 and CB-3, if such a use would be

"compatible with the gardens uses" to be developed. No determination as to this compatibility has yet been made. Up to 50 market-rate dwelling units were evaluated for CB-2 under Alternatives A and B of the YBC FEIR. No dwelling units were evaluated for CB-3.

The approved YBC Redevelopment Plan permits residential uses on CB-2, but such uses are not permitted on CB-3. The schedule for the Exclusive Negotiations now provides for O & Y to present its alternative development concepts (a revised Phase I report) to the Agency staff and the public at the end of August 1981. Should the alternative development concepts for CB-2 and CB-3 include uses or intensities of uses which, as provided for in Section 15067 of the CEQA Guidelines, might involve new significant environmental impacts not considered in the YBC FEIR, then a second supplement to the YBC FEIR, containing the information necessary to make the previous EIR adequate for the project as revised, would be prepared.

Although the environmental review process for the Yerba Buena Center redevelopment area has required the Supplement now under review, and may require future supplements as provided for in the CEQA Guidelines, this does not mean that the approval process for development of the three Central Blocks will be "piecemeal" as suggested in the comment. The Land Disposition Agreement with Olympia and York will not be approved by the Redevelopment Agency Commission until the appropriate environmental review on all portions of the O & Y proposal for the three blocks has been determined to be complete (T. Conrad, Chief of Planning, Redevelopment Agency, telephone conversation, 9 July 1981). There will be further opportunity for public comment of the proposals to be developed. The Agency Commission expects to conduct one or more public workshops in September on the alternative development concepts to be presented to the Agency staff at the end of August by O & Y. Then the Commission expects to select a single concept to be further refined. During the following months there will be additional public workshops before the formal public hearing on the proposed Land Disposition Agreement, currently expected to occur late in 1981. The Land Disposition Agreement on all of the Central Blocks will then be made final; it will be made available for public review, publicly heard and approved by the Agency Commission. Dates for the hearing and public review period have not been set.

5. SOUTH OF MARKET LAND USE PATTERNS

COMMENT

Sue Hestor: "In terms of Land Use and Zoning on Page 42... I think that the Planning Department has an obligation to talk about the shifting land use patterns in the area, and it's not even really mentioned there. You talk about land use in the microcontext of this site. The reality is there was a SPUR meeting on Monday that got good coverage that is dealing with South of Market. This Commission is dealing with South of Market. The people South of Market are starting to deal with South of Market, and the land use patterns are changing..."

RESPONSE

A paragraph has been added on page 42 immediately after the first paragraph on the page to read:

This land use change is part of a trend occurring in South of Market blocks nearest Market St. A San Francisco Planning and Urban Research Association (SPUR) study on South of Market/1/ identifies office expansion as a major development pressure in the area, particularly east of YBC from Market to Folsom Streets. The expansion is likely to continue; SPUR projects that at least two-thirds of the Downtown growth between 1980 and 1990 can be expected to occur in South of Market. The SPUR study recommends that mixed-use housing and commercial development be encouraged in the southern and eastern areas of CB-1 and that retail, entertainment and office uses be encouraged along Market St. and in the western portion of CB-1./1/ Major tourist hotel developments of about 1,800 rooms have also recently been approved approximately two blocks west of the site (North of Market) and further hotel development has been proposed for that area.

The following footnote has been added on page 44, immediately before "B.
HOUSING AND BUSINESS RELOCATION":

/1/ San Francisco Planning and Urban Research Association (SPUR), June
1981, South of Market: A Plan for San Francisco's Last Frontier.

6. PURPOSE OF DEVELOPMENT PLANS FOR CB-1

COMMENT

Sue Hestor: "... I have a hard time reading this EIR trying to figure out the context in which it was operating...What generated this EIR was an accommodation... to the developers that were being asked to come in on the RFQ... if the pot needed to be sweetened on Block No. 1 or on one of the peripheral blocks of YBC, to accommodate our concerns that Blocks 2 and 3 have active community uses on them that would draw the people of San Francisco and not just attract conventioneers, ... that to accommodate the developers, to make it financially feasible, there were some modifications that would be put in the pot -- and that's what this EIR is about...The project description on Page 16. This is the place where I think the staff has to start describing the context of the project, but this is the starting point..."

RESPONSE

The comment is correct in that the hotel uses were included in the RFQ as an incentive for potential developers to undertake redevelopment of the three Central Blocks. Community uses on the three blocks have not been eliminated from consideration by the Redevelopment Agency. Development concepts for the three Central Blocks are not yet final (see also the Response to Comment No. 4). The following sentences have been added to the background section, A. Reasons for this Report, page 2, in the first partial paragraph preceding the words "In addition...".

"The Redevelopment Agency has proposed these changes for CB-1 as an incentive for private development. The higher return on investment available from these uses is expected to offset a lower return from community, cultural and recreational uses also under consideration within CB-2 and CB-3."

In addition, a parenthetical reference has been inserted at the end of the first sentence on page 16 to read: "(see page 2 for the reasons for these changes)."

7. ALTERNATIVE USES FOR JESSIE ST. SUBSTATION

COMMENT

Commissioner Susan Bierman: "Page 16. Let's talk about the Jessie St. Substation. One thing that I think may be missing in here is alternative uses -- maybe it doesn't need to be extensive. But the one thing I know has some controversy surrounding it is the Jessie St. Substation, and it would seem to me there should be discussion of alternatives other than retail use. There are several groups in the City that I know of who want to use the Jessie St. Substation for other than retail..."

RESPONSE

The RFQ includes the development of the Jessie St. Substation and preservation of the building with a mix of retail, commercial, cultural and office uses for the Jessie St. Substation. These uses are all allowed uses under the Redevelopment Plan. Should cultural or community uses be included, their impacts would generally be less than or equal to those of the office and retail-commercial uses analyzed in the Draft Supplement and YBC FEIR.

8. HOUSING IMPACTS AND SOCIAL CHARACTERISTICS OF RESIDENTS

COMMENTS

Sue Hestor: "What are the pressures that the City is creating when a development project creates a housing demand and either doesn't fill it or only fills it with market-rate housing? Who lives in that housing? Who can afford to make the payments, to make the down payment?... an EIR doesn't put down in it explicitly what that means... what kind of pressures there will be on the rest of South of Market as well as the north of Market that's close to there to eliminate low-income and moderate-income housing that remains in the downtown area because there are so many more affluent people that have homes in that area."

"... On Page 24, when you start talking about social characteristics and housing and business -- and the housing thing comes up in several places -- I find it really insufficient to talk about housing merely in the context of housing on Block 1. This block is in the middle of a residential area. It really is residential down in that area."

"... the impacts that flow from my previous remarks on housing really need to be picked up here on Page 44. And again, the economics. When you are talking about environmental impacts, you have to pick up the economics of the shift of what is going to probably happen in terms of what the developer is going to come in with..."

"... On mitigation measures, Page 78, the social characteristics mitigation stuns me. That's people -- and, you know, this housing is going to mitigate; this upper-income housing is going to mitigate the loss of population...It doesn't really analyze what kind of mitigation -- you don't even get to the question of how you mitigate it. What are the characteristics of people who have apartments? I mean, there's a very simple project that you could compare it to. Compare it to Golden Gateway. Compare it to those townhouses. Compare it to those apartment towers, and tell me what is the percentage of those buildings that are actually owner-occupied by a person who lives there and not by a corporation? My own knowledge of those buildings is that those

buildings tend to get a lot of corporate ownership....How do you mitigate anything if people really don't live there or if the people that live there make certain kinds of demands for services like high-priced restaurants that are accommodated in adjoining areas that serve low-income people?... What are the mitigation pressures on the people who live between Seventh and Tenth St.?"

"... If all of a sudden all we have down at YBC is luxury, high-income housing -- and market rate housing in the City is luxury housing these days because no one is building housing for people that I can afford or that even, I think, that a lot of you can afford."

Commissioner Susan Bierman: "Page 78. I, too, was troubled about the social characteristics paragraph. I think it oversimplifies the situation. The population that was lost was low-income but not certainly all seniors..."

RESPONSE

The following text changes have been made to the Social Characteristics Setting section on pages 24 - 25.

A paragraph has been added immediately before the first paragraph of the section to read:

The characteristics of the population living in YBC prior to the property acquisition, and subsequent relocation of resident and businesses and demolition of structures, are described in detail on page 84 of the YBC FEIR, based on a 1963 survey made of the area. The survey found that the majority of the households were single-person households (93%) ; the majority of the people were male (93%), Caucasian (87%) and over the age of 45 (68%). These people were generally unemployed or had small incomes and lived in residential hotels. Of the few families living in YBC at that time, the majority had employed heads of households and lived in apartments.

A sentence has been added immediately after the last sentence on page 24 to read: "To date 259 TODCO (Tenants and Owners Development Corporation) units,

for the elderly, have been built in YBC. About 365 more units are scheduled to be built."

A paragraph has been added immediately after the last paragraph on page 24 to read:

Most of the housing in the South of Market is concentrated west of YBC, beginning near Sixth St. and extending to Ninth, and from Mission to Harrison. Residential buildings are interspersed with commercial and industrial uses, and consist primarily of two- to five-story buildings on small lots. The elderly probably make up the largest community group there today. Filipinos constitute the largest ethnic community and most of the South of Market families. /2/

A new footnote /2/ has been added to page 25 to read: "/2/ Information in this paragraph is from San Francisco Planning and Urban Research Association (SPUR), June 1981, South of Market: A Plan for San Francisco's Last Frontier."

The following text changes have been made to the Social Characteristics Impact section on pages 44 and 45. Two paragraphs have been added immediately before the first paragraph of the section to read:

Relocation activities and housing impacts are discussed in depth in the YBC FEIR, pages 233 to 240. This section concludes that YBC in any of its alternatives would have an impact on the City's low-income housing supply. Although all of the YBC alternatives included subsidized housing, the greatest number of units proposed was less than the number of households relocated. A total of 1,661 low-income housing units were rehabilitated citywide by the Redevelopment Agency and the City in response to the Toor litigation in 1970. Preferential allocation of these units was given to YBC displacees.

The provision of the proposed 500 market-rate units could have some effect on reducing the shortage of and high demand for housing units in other parts of the City and elsewhere in the Bay Area, for it would attract downtown workers who would otherwise commute from outlying areas. The inclusion of housing units on CB-1 would contribute to the reintroduction

of a residential population in YBC, but although the exact demographic nature of the population cannot be projected, it is likely that it would have a higher income level and different social character than the population displaced in the 1960s and 70s.

The third sentence of the last paragraph on page 44 has been deleted.

The Golden Gateway currently has 50 condominium units, but has plans to eventually build a total of 150. These units are part of the "Golden Gateway Commons"; all units in the older Golden Gateway Center, including the townhouses, are rental units. The price range for the condominiums is currently from \$250,000 to \$550,000. This housing would be affordable to those with yearly incomes ranging from approximately \$83,000 to \$183,000. Two of the 50 units, or 4 percent, are owned by corporations. (D. Langston, Expeditor, Golden Gateway Center, telephone conversation, June 24, 1981)

The first mitigation measure under Social Characteristics on page 78 has been deleted. A new measure has been added as follows:

PROPOSED ADDITIONAL MEASURE

The Redevelopment Agency would consider requiring that the sales agreements of the market-rate units proposed on CB-1 specify that the purchasers must agree to occupy the units for at least one year after purchase.

The nearest concentration of unsubsidized low-income housing is approximately two blocks west of CB-1. The demand for services on CB-1 may or may not affect services west of Sixth St. It is likely, however, that the proposed mixed-use development in CB-1 would contribute to the general trend of increasing land values in South of Market nearest Market St., and thus to possible increases in the cost of services to residents west of Sixth St. It is not expected that development of CB-1 under the new mixed-use proposal would result in a significantly greater effect than would development on the block under the four alternatives considered in the YBC FEIR.

9. HIRING POLICY

COMMENT

Michael Visconti, ABAG: "The addition of 500 market-rate units proposed for Central Block 1 supports both regional policy and the earlier staff comments... Furthermore, the addition of 1500 hotel rooms will provide more jobs for entry-level workers. The final EIR should examine whether measures can be implemented to target a substantial portion of these jobs, perhaps through the use of on-the-job training programs and/or CETA eligibility, for the neighborhood's and City's unemployed and underemployed. Staff therefore finds that the changes proposed for Central Block 1 of the Yerba Buena Center are supportive of regional policy.

RESPONSE

Forty percent, or about 1600, of all permanent jobs created by the mixed-use development on CB-1 would be for hotel workers (see page 45 of the Draft Supplement). Many of these jobs would be for the unskilled, semi-skilled, low- and middle-income workers. Alternatives A, B, C, and D of the YBC FEIR were primarily mixes of office and retail-commercial uses, with few entry-level job opportunities.

The Redevelopment Agency has established preferential hiring policies, "Affirmative Action Requirements Relating to Mixed Use Development" (August 13, 1980), which would apply to new jobs at all levels on CB-1 after development. These policies include the following: 1) first consideration would be given to applicants who reside in the City and County of San Francisco, and 2) those hired would approximate the ethnic and gender mix of the City and County of San Francisco. Although hotel-worker positions would not be specifically targeted for the City's unemployed and underemployed, the positions would be covered by the preferential hiring policy as quoted. The decision to implement on-the-job training programs would be made by the employer.

CETA is a federal program administered by the Mayor's Economic Development Council in San Francisco. This program encourages developers and employers to target some jobs for CETA-eligible San Francisco residents, generally unemployed youth and minorities. The program can be required of a developer by the City as part of a project approval process, but is otherwise voluntary. To encourage employer participation, CETA has been offering incentives. One of these incentive programs involves CETA recruitment and initial classroom training of employees, 100 percent funded by CETA, followed by on-the-job training by the employer, 50 percent CETA-funded. The decision to implement a CETA or other training program would be made by the employer or developer.

10. RESIDENTIAL HOTEL CONVERSION

COMMENT

Sue Hestor: "The cumulative hotel development impacts on Page 47 stick their toe in the water. What it doesn't do is analyze the impact on the people who live in the area and who feel pressured as either their building is feeling under the gun to be converted or the next building or another building is torn down, and there are more people competing for the same space so the hotel owners can raise the rates. There is a real connection between the residential hotels and tourist hotels, and I don't see it. I see the effect on the tourist industry and how it can expand, but what about the people who live here that are losing housing to a lot of these projects?"

RESPONSE

A subsection has been added to the Cumulative Hotel Development Impacts section, immediately preceding the Cumulative Hotel Tax Contributions subsection on page 50, to read:

The only residential hotel immediately near CB-1 is the Victorian Hotel on the corner of Fourth St. and Jessie St. Several residential hotels are located two blocks further west, along Sixth St. Hotel development on CB-1 would contribute to, but not be totally responsible for, rising land values in the area and resulting pressure to convert these units to tourist units. Other contributing factors are the increase in the tourist trade expected from the opening of the George R. Moscone Center, and the growth of Downtown uses South of Market. Upward pressure on local land values would be no greater under the mixed use development than under any of the YBC alternatives for CB-1. For information on hotel development on the edge of a residential neighborhood, refer to San Francisco Department of City Planning, Hotel Ramada Final Environmental Impact Report, (certified January 29, 1981) EE 80.171, SCH # 80092315.

11. ECONOMIC VIABILITY OF SMALL BUSINESSES

COMMENT

Sue Hestor: "But one of the economic characteristics of this project that the Redevelopment Agency and the Mayor's Select Committee really poured a lot of blood into was how to make that area economically viable for small businesses that would support San Francisco residents who work there and that would be attractive to those residents..."

RESPONSE

A mitigation measure has been added at the end of Proposed Additional Measures in the Land Use, Zoning, and Visual Aspects section at the top of page 78 to read:

The Redevelopment Agency would work with the developer to endeavor to make small, affordable retail-commercial spaces available.

12. PUBLIC BENEFITS

COMMENT

Richard Gryziec: "... this EIR is incomplete because it fails to include an accounting of the public benefits produced by or attributable to the facilities included in this Supplement...What is more basic for a public project, especially one with a history of the Yerba Buena Center, than for the public to know up front and through the EIR process what the public benefits from the project will be?"

RESPONSE

The Guidelines for Implementation of the California Environmental Quality Act (CEQA) (CAC Title 14, Division 6, Chapter 3) do not require that an EIR give an accounting of public benefits (see Article 9, Contents of Environmental Impact Reports, Sections 15140-15151). According to CEQA, an EIR must document "significant effects" defined as follows: "Significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by this activity..." (Section 15040).

For informational purposes, public benefits are identified in the Draft Supplement, but they are not discussed in the same depth as are potentially adverse effects. Public benefits due to the proposed mixed-use development on CB-1 would be considered by many to include the following: preservation of two buildings of architectural and historic merit (the Mercantile Bldg. and the Jessie St. Substation); the provision of 2,900 person-years of construction employment, 25 percent more than under any of the YBC alternatives (see pages S-3 and 45 of the Draft Supplement); generation of approximately \$3.76 million annually in hotel room tax revenues (see pages S-3 and 47); encouragement of the expansion of the convention tourist market in San Francisco (see page 50); and provision of a pedestrian concourse (see pages S-1 and 16), providing public access from Market St. via Central Block 2 to the Convention Center on Central Block 3. Income from the Redevelopment

Agency lease of land to the developer (the Land Disposition Agreement) would go directly to the Department of Housing and Urban Development (HUD).

13. POLICE SERVICE MITIGATION

COMMENT

Sue Hestor: "The summary page, S-2, talks about this new change in Block 1 is going to require a police car full time. I looked in the mitigation measures. I can't find a mitigation measure dealing with police services... I want to see some mitigation on some of these things that seriously deals with requirements for the City to provide services that the City doesn't have the money for any more."

RESPONSE

A mitigation measure has been added to the end of the subsection, Proposed Additional Measures, on page 79 of the Draft Supplement to read:

The Redevelopment Agency would recommend to the City the provision of an additional police car and two officers to patrol 24 hours in the vicinity of CB-1. The cost of the additional police car and officers would be offset to an undetermined extent by the provision of approximately \$1.27 million per year in unallocated hotel room tax revenues, as well as other revenues (see page 47 of this report, and pages 269-271 of the YBC FEIR).

14. SEWAGE TREATMENT PROJECTS

COMMENT

Commissioner Susan Bierman: "Page 28. There's talk in here about the sewer projects, and I thought maybe there should be a paragraph or a line or two added in light of the most-recent developments about limitation of sewage. Just a paragraph saying that some of the plan that this says is going to happen may not happen..."

RESPONSE

According to Don Hayashi, Coordinator of Public Participation for the San Francisco Clean Water program (telephone conversation, June 30, 1981), the paragraph referred to on page 28 still accurately reflects the City's plans for waste water treatment. Because of recent Federal government funding cutbacks, however, realization of these plans may not occur until sometime after the end of the decade. The dry-weather treatment facilities mentioned are still scheduled for operation in December, 1982. These facilities and the currently-operating North Point Pollution Control Plant will continue to treat the City's wastewater until funding has been obtained and the wet-weather facilities completed. The following changes have been made to reflect this information.

The word "interim" in the ninth line of the first full paragraph on page 28 has been deleted. The phrase, "possibly near the end of the decade, and", beginning in the fourteenth line of the same paragraph, has been replaced with the following phrase: "which may be until after the end of the decade due to 1981 cutbacks in Federal funding programs." The first letter in "at", which begins the next clause, has been capitalized.

15. AREA TRAFFIC

COMMENT

John West, CalTrans District Director: "Project generated traffic will add to existing AM and PM peak period congestion on State Routes approaching and within San Francisco. The traffic and transportation impacts on the state highway system will be cumulative, including not only the Yerba Buena Center but also all the proposed high-rise offices, hotels, redevelopment projects, housing, etc., in the Central Business District. Therefore, it is believed that a screenline volume study around the perimeter of the City should be considered (Macro Scale). Every EIR reviewed from the Planning Department so far touches only on the Micro Scale effect on the future. Mitigation measures have not been proposed for the increase in attractions and the resulting effect on the state highway system. If an independent traffic analysis, study or management plan has been prepared or is in progress for the macro area, a discussion and reference would be appropriate.

RESPONSE

Off-site transportation impacts (including those on the freeway corridors) from development of YBC as a whole are discussed generally on pages 345 to 346 of the YBC FEIR. The peak-hour traffic generated by the proposed mixed-use development on CB-1 in combination with that from the rest of YBC would not exceed those impacts discussed in the YBC FEIR. The Redevelopment Agency would prepare a Transportation Management Plan to address vehicular traffic circulation and automobile parking as stated on page 80 of the Draft Supplement. The Transportation Management Plan would include a discussion of off-site traffic impacts.

A Master Environmental Impact Report, covering the effects of several development scenarios for the downtown C-3 districts, has been authorized to be prepared for the City Planning Commission. This report, expected to be completed in 1982, will analyze the effects of cumulative approved, proposed

and anticipated development in downtown San Francisco under the several development scenarios. Traffic impacts on the main corridors into the City will be discussed.

16. TRANSIT FEES

COMMENT

Commissioner Susan Bierman: "On page 79 under Transportation, there's no discussion of transit fees..."

RESPONSE

The following mitigation measure has been added on page 80, immediately before the paragraph entitled, Parking and Circulation:

Transit

In recognition of the need for expanded transportation services to meet the peak demand generated by cumulative commercial development in the downtown area, the Redevelopment Agency may require the developer to contribute funds for maintaining and augmenting transportation service, in an amount proportionate to the demand created by the project, in accordance with Ordinance Numbers 224-81 and 225-81, enacted on May 5, 1981, amending the San Francisco Administrative Code.

17. GROWTH-INDUCING IMPACTS

COMMENT

Sue Hestor: "on page 89, the growth inducement impact on Central Block 1. I think maybe you said it all in the YBC FEIR. However, with the change in the project since that Final EIR was certified, I think you have a different growth inducing impact than what you have here."

RESPONSE

The Growth Inducing Impact (Central Block 1) section on page 89 of the Draft Supplement describes specific impacts due to the proposed development. The discussion on pages 519 to 520c in the YBC FEIR is general; it addresses the probable growth inducement of the entire YBC project under the groupings of land uses and densities of each Alternative. The Draft Supplement section on page 89 incorporates the YBC FEIR discussion by reference, and focuses on the growth-inducing impacts of the proposed development on CB-1 alone. The Draft Supplement section also identifies the growth which would be stimulated by the construction of hotel rooms and additional dwelling units on CB-1 which were not addressed in the YBC FEIR.

18. UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

COMMENT

Sue Hestor: "The unavoidable significant environmental effects stated on Page 86 have the same problems. You do not deal with human effects. You do not deal really with unavoidable economic effects if the project shifts..."

RESPONSE

It is not expected that the off-site, indirect economic effects of development of the mixed-use proposal would differ significantly from the effects of development on CB-1 of any of the four alternatives analyzed in the YBC FEIR for the block. The direct on-site economic effects that would differ, such as the generation of hotel room tax revenues, are discussed in the Economics section, pages 45 - 51. The new mixed-use proposal would result in more concentrated residential uses on CB-1 than would Alternatives B and C, the two alternatives discussed in the YBC FEIR proposing housing on the block, as stated on page 86 of the Supplement. The housing under consideration would be market-rate in the new mixed-use proposal as well as under Alternatives A and B. (See also the Response to Comment No. 8)

19. IMPACT ANALYSIS FOR PRIVATE HIGH SCHOOL ON SB-4

COMMENT

Commissioner Dian Blomquist: "Does this stating a number of 300 limit the amount of students in Bridgemont High School?"

RESPONSE

The analysis done for the proposed private high school on SB-4 was based on an assumed 300 students. The analysis has a tolerance range of approximately 10 percent. That is, if the student body were between approximately 285 and 315, the impacts would not differ significantly from those in the Draft Supplement.

Quantitative impacts which are dependent on the number of students, such as energy use, community service requirements, and traffic, would not exceed those of YBC Alternatives C and D, the highest intensity alternatives for SB-4, for a high school student body of up to 400 students. The constraint at

400 students would be parking demand; a high school of this size would require a number of parking spaces equal to that in YBC Alternatives C and D.

20. OPENABLE WINDOWS FOR PRIVATE HIGH SCHOOL ON SB-4

COMMENT

Commissioner Dian Blomquist: "Also comments as to mitigation measures, the Bridgemont High School sealed windows. Back to the same old problem of let's try to have windows that open."

RESPONSE

Fixed windows have been identified as a mitigation measure for the poor air quality experienced on SB-4 (see pages 122-123 of the Draft Supplement). Because of the site's proximity to the elevated James Lick Freeway (Route 80), eight-hour averaged carbon monoxide concentrations at the site currently exceed and will continue to exceed State and Federal Standards (see pages 114-116 of the Draft Supplement). Health effects resulting from prolonged exposure to SB-4 carbon monoxide levels on days of poor pollutant dispersion (such as during thermal inversions) would include headaches, dizziness, and shortness of breath (see page 115 of the Draft Supplement). Outdoor athletic activity would aggravate these effects. Measurements made of lead concentrations near the elevated James Lick Freeway indicate that in areas such as SB-4 lead concentrations may also exceed State standards (see page 115 of the Draft Supplement).

Additionally, noise levels at the site due to freeway traffic would be great enough to interfere with all outdoor activity, and, with windows open, to necessitate raising one's voice indoors in order to be heard at a distance of 20 feet (see pages 116-117 of the Draft Supplement). San Francisco land use compatibility criteria for community noise discourage the construction of schools in noise environments similar to that on SB-4. Extensive noise

insulation features, including sealed windows, would be necessary to provide an acceptable indoor noise level for classroom activity (see page 117 of the Draft Supplement).

21. SB-4 AIR QUALITY MITIGATIONS

COMMENT

Gary Agid, Air Resources Board: "The Draft Supplement needs to present additional information on the potential air quality benefits from the proposed mitigation measures. The calculations included in the report, page 99, indicate the national 8-hour CO air quality standard would be violated as a result of this project. All feasible mitigation measures, therefore, need to be considered to reduce the projected impacts. Also, the responsible agency(ies) which will be implementing these measures need to be identified."

RESPONSE

The table on page 99, referred to in the comment, shows existing carbon monoxide concentrations along Harrison St., Third St., and Interstate 80 (the elevated James Lick Freeway). The table indicates that the Federal eight-hour carbon monoxide standard is currently violated along all through roadways and that the one-hour standard is violated along Route 80; these standards are currently violated without construction of the high school or any other proposed project.

Table 23 on page 114 of the Draft Supplement shows existing, base case (1988 conditions without the project), and 1988 (year of proposed project completion) project case carbon monoxide concentrations on SB-4 due to contributions from the through roadways above. Both the one-hour and eight-hour standards are currently exceeded. Although the 1988 base case concentrations would be reduced due to vehicle emission improvements, the eight-hour standard would continue to be violated at SB-4. Project

implementation would cause no statistically significant change in the 1988 base case conditions. Traffic emissions from Interstate 80 and on Third Street would be so great that contributions from the proposed private high school or any of the YBC alternatives would not be statistically significant (see pages 113-115 of the Draft Supplement). Since even the no-project alternative could not mitigate poor air quality at SB-4, implementation of the suggested mitigation measures for mobile source emissions given on page 123 of the Draft Supplement would not have a statistically significant effect on outdoor carbon monoxide concentrations.

Mitigation measures on page 122 and the top of page 123 of the Draft Supplement are suggested as means to reduce exposure of the students and faculty to the high outdoor pollutant levels. If accepted by the Redevelopment Commission, these measures would be incorporated into the building design, with the cost to be borne by the developer (see also the Response to Comment No. 20).

22. STAFF-INITIATED TEXT CHANGES

On page 103, a sentence has been added at the end of the first full paragraph to read: "Two foundations of buildings existing in the 1880's have been discovered on SB-4./2/" A footnote /2/ has been added at the end of the section to read: "Roger R. Olmsted et. al., August 1979, The Yerba Buena Center Report on Historical Cultural Resources, prepared for the San Francisco Redevelopment Agency." On page 120, the second sentence in the section, Architectural and Historic Aspects, has been deleted. The following sentence has been inserted: "Since the completion of the YBC FEIR, two possible historical sites have been identified on SB-4. /1/" A footnote has been added at the end of the section on page 120 to read: "/1/ Roger R. Olmsted et. al., August 1979, The Yerba Buena Center Report on Historical Cultural Resources, prepared for the San Francisco Redevelopment Agency." No further archaeological mitigation measures are proposed for SB-4 because the Department of Housing and Urban Development (HUD) determined that these sites were not of sufficient historical significance to warrant further

investigation, and, therefore, has released the YBC project sites from further archaeological testing, soil boring and excavation (Henry Dishroom, Area Manager, letter dated February 6, 1981) (see page 125 of the Draft Supplement).

On page 106 in the second sentence of footnote /2/ "Hoult" has been changed to "Hautt". On page 131 under "Bridgemont High School", "Hoult" has been changed to "Hautt".

The sixth and seventh sentences in the first full paragraph on page 61 have been deleted and replaced with the following new paragraphs, noting that access from Mission St. would be heavily used, given the assumed lack of a connection internal to CB-1 between Third St. and the estimated 435 non-hotel parking spaces, and would conflict with the westbound transit lane:

Traffic coming to CB-1 from the south would (by assumption) have access from Third St. only to the parking spaces for the Arcon Pacific Hotel. The majority of parking on the block would, therefore, be accessible only from Fourth St. or Mission St. This would produce a demand for right turns into and out of a Mission St. garage entrance. Traffic from the north would probably enter at the Fourth St. access point, but could return north via either a left turn or right turn from a Mission St. Garage egress. These midblock turning movements onto and off Mission St. would conflict with Muni buses in the transit-preferential diamond lane on Mission St., other vehicles, and pedestrians. Buses in the transit-preferential lane would occasionally block the line-of-sight for outbound drivers exiting the garage. There would be conflicts with pedestrians on the sidewalk at the curb cut and, were the proposed midblock pedestrian crossing of Mission St. to be at grade, outbound drivers would have to manage potential conflicts with these pedestrians as well. Delays for outbound drivers, particularly in making left turns, might be prolonged during the peak hours, or the turning vehicles could disrupt the traffic flow on Mission St.

The second full paragraph on page 80 of the YBC DEIR Supplement has been changed to read:

Were the CB-1 garage to have no entrance or exit on Mission St., but rather to have equal access to all parking spaces from both Third and Fourth Sts., the impact on the traffic on Mission St. would be reduced. However, it may be difficult to provide a connection between the Third and Fourth St. garage access points, given the difficulty in excavating under existing buildings, which are to remain. If no internal circulation were provided in the block, the spaces would have to be distributed as 260 spaces with access onto Third St. and 265 spaces with access onto Fourth St. to allow Level of Service D operation of the intersection of Mission and Fourth Sts. The location of garages and the access points to them would be determined by the Redevelopment Agency during review of specific building proposals for CB-1.

A paragraph has been added, below the first partial paragraph on page 58, to discuss the safety and operational problems of midblock pedestrian crosswalks at grade as follows:

A midblock crossing of Mission St. could be constructed to allow the movement of pedestrians between CB-1 and CB-2. It was estimated (YBC FEIR, Figure 31 and 32, page 319 and 321) that as many as 1,600 pedestrians would use the crossing during the p.m. peak 15 minutes period, or one every half second. If a grade separation (overcrossing) were not provided, delays for both pedestrians and vehicles would result and accidents could occur involving pedestrians attempting to cross the street at mid-block. Mission St. is relatively wide, requiring a long time for pedestrians to cross. The block length is long enough that vehicles may attain speeds of about 30 miles per hour between intersections. These factors, and the uncommon occurrence of midblock crossings which make them unexpected for drivers, increase the potential for accidents, so that such crossings are to be regarded as a serious safety problem for pedestrians.

A potential mitigation measure has been added as a mitigation measure on page 80:

The design of the pedestrian concourse could include a pedestrian overcrossing(s) of Mission St. to separate pedestrian movements from the traffic on Mission St. If an "on grade" pedestrian crossing is developed

on Mission St. (between Third and Fourth Sts.) appropriate traffic control devices would be installed to reduce the potential for accidents involving pedestrians and delays associated with pedestrian-vehicle conflicts. These hazards would be eliminated entirely by a grade-separated overcrossing(s).

A typographical error omitting the footnote number (#7) at the end of paragraph 3 on page 32 has been corrected, as has the date of adoption of the Revisions in the same paragraph, which should be 1977 rather than 1972.

The following sentences have been inserted on the last line of page 60, immediately after the sentence ending, "...Number of dwelling units constructed":

Residents at Fox Plaza (rental units) in downtown San Francisco currently lease one parking space in the Fox Plaza garage for approximately every three occupied units./5/ Parking spaces at the Golden Gateway Center were constructed at a rate of approximately one for every three rental units and one for each condominium unit./6/ Traffic from CB-1 was calculated on the basis of standard trip-generation factors for each use and standard modal split factors for downtown San Francisco, according to methods used and documented in the YBC FEIR. These factors do not depend on the number of parking spaces provided on CB-1 (see YBC FEIR Appendices, Table F-1, page 57, and pages 56-59). The amount of parking provided on CB-1, therefore, would not affect the trip-generation analysis.

The following new footnotes /5/ and /6/ have been inserted on pages 63 and 64:

/5/ J. Silva, Manager, Fox Plaza Garage, telephone conversation, July 8, 1981.

/6/ D. Langston, Expediter, Golden Gateway Commons, telephone conversation, June 30, 1981; C. Bray, Leasing and Service Manager, Golden Gateway Center, telephone conversation, June 30, 1981.

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